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March 18, 2021

**VIA ECF**

The Honorable Peggy Kuo, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Esther Buchbinder, et al. v. Gary Terrinoni, et al.  
Civil Action No. 1:20-cv-01421 (ENV) (PK)**

Dear Judge Kuo:

This firm represents defendants in the above referenced matter. Along with plaintiff's counsel, Matthew Bryant, we write to jointly request an extension of time to Answer, move or otherwise respond to the Complaint.

By way of background, on June 15, 2020, Mr. Bryant informed defense counsel that then-plaintiff Shalom Buchbinder had passed away. At that time, defendants' deadline to respond to the Complaint was August 24, 2020. (ECF No. 8). On August 6, 2020, the Court granted the parties' joint request for an extension of defendants' time to respond to the Amended Complaint, to October 23, 2020, in light of the death and in order to provide an opportunity to explore the possibility of settlement. (ECF No. 10). However, the parties were unable to explore settlement until Shalom Buchbinder's spouse, Esther Buchbinder, joined the lawsuit. The parties jointly requested an extension of time to January 21, 2021, to allow for her substitution. (ECF No. 12). On September 25, 2020, the Court granted that request. On December 22, 2020, Esther Buchbinder filed a motion to join the lawsuit. (ECF No. 14). On December 24, 2020, the Court granted that motion. Once Esther Buchbinder joined the lawsuit, the parties were able to explore settlement. To allow them time to do so, the parties jointly requested an extension of the deadline to respond to the Complaint until January 21, 2021. On January 19, 2021, the Court granted that request.

Counsel then discussed potential settlement. Ultimately, however, the parties decided that mediation may be more productive. They agreed to proceed to mediation, agreed on a mediator and agreed on (and confirmed) a mediation date of May 10, 2021.

Defendants' deadline to Answer, move or otherwise respond to the Amended Complaint is March 22, 2022. The parties respectfully request a 60-day extension, to May 20, 2021, to allow the parties an opportunity to attempt to resolve the case in mediation. This extension would not impact any other scheduled dates.

The Honorable Peggy Kuo, U.S.M.J.

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Thank you for Your Honor's attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Lynne Anderson", is written over a faint circular stamp.

LYNNE ANNE ANDERSON